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KING COUNTY
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IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

JENNY LU) No. 22-2-10378-7 SEA
7 PETITIONER,)
8 v.) RESPONDENT'S OPPOSITION AND
9 ANGELO PRADO,) RESPONSE TO PETITIONER'S
10 RESPONDENT) DOMESTIC VIOLENCE
11) PROTECTION ORDER
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The Respondent, Angelo Prado, by his attorney, Brent Hart (Hart Jarvis Chang PLLC) opposes the request for a protection order. No domestic violence, harassment, stalking or sexual assault exists. The reality is that contrary to Ms. Lu's unproven allegations, Mr. Prado has been a patient, loving and generous friend to Ms. Lu. Unfortunately, Ms. Lu has taken advantage of Mr. Prado, feels entitled to unlimited financial support and is now using the Court as a weapon against Mr. Prado as a means to pursue financial renumeration in a potential future lawsuit. It is no coincidence that when Mr. Prado's financial support ended, the request for a no contact order was filed. Her claims aren't credible in light of shared text messages, her willingness to embellish and lie in other contexts, easily disprovable lies in her petition, and according to other witness' declarations. The request for a protection order should be denied.

1

2 **I. General Legal Authority Regarding Domestic Violence Protection**

3 **Orders.**

4

5 RCW 7.105.100 authorizes the issuances of protection orders. RCW 7.105.100

6 (1). Petitions that may be filed include domestic violence protection orders, unlawful

7 harassment protection orders, sexual assault protection orders, or stalking harassment

8 orders. Id. Where an intimate partner or family or household relationship exists, the

9 petitioner, may but is not required to seek a domestic violence protection order. Id.

10 RCW 7.105.225 governs the issuance of protection orders after a hearing. The

11 petitioner has the burden of proof and is required to prove her case by a preponderance

12 of the evidence. In relevant part, RCW 7.105.225 states:

13

14 (1) The court shall issue a protection order if it finds by a preponderance of the

15 evidence that the petitioner has proved the required criteria specified in (a)

16 through (f) of this subsection for obtaining a protection order under this chapter.

17 (a) For a domestic violence protection order, that the petitioner has been

18 subjected to domestic violence by the respondent.

19 (b) For a sexual assault protection order, that the petitioner has been subjected to

20 nonconsensual sexual conduct or nonconsensual sexual penetration by the

21 respondent.

22 (c) For a stalking protection order, that the petitioner has been subjected to

23 stalking by the respondent.

24 (f) For an antiharassment protection order, that the petitioner has been subjected

25 to unlawful harassment by the respondent.

26

RCWA § 7.105.225 (West)

23

24 **II. There Is No Basis For a Protection Order**

25

26

1 The Petitioner has made a variety of claims. Starting on page 8 of her petition,
2 she begins by asserting that Mr. Prado has made “numerous, progressively explicit and
3 serious threats over several months.” She characterizes the relationship as “coercive”
4 filled with emotional and sexual abuse. See Page 8, section 16 of the Petition. She
5 describes, without evidence, instances of physical restraint, non-consensual sex, a
6 forced move from the east coast, coerced travel, threats of “extensive and expensive
7 legal actions” and abuse of power at work. Her allegations are false, unsupported, and
8 are wholly inconsistent with the thousands of text messages that the couple have
9 exchanged over the course of their multi-year relationship.

10 The reality is that Ms. Lu and Mr. Prado have had an ongoing, non-exclusive,
11 off-again-on-again relationship since late 2019. While Mr. Prado has provided
12 financial support, there was never “financial coercion.” While Mr. Prado has taken Ms.
13 Lu on trips all over the world, records show that Ms. Lu was excited about those trips
14 and eager to travel more with Mr. Prado. While Mr. Prado helped find Ms. Lu a good
15 job at Microsoft, there was never pressure for her to move nor was there pressure for
16 her to stay if she was unhappy. And while the two have certainly had disagreements
17 and heated exchanges as any long-term relationship often does, there was never
18 anything that could be characterized as domestic violence, stalking, harassment or
19 assaultive. Ms. Lu’s claims are often intentionally vague, without supporting evidence,
20 and are simply untrue. In order to best assist the court to keep the allegations straight,
21 they are listed in order below along with the Respondent’s response.

22

23 **A. The interaction on 6/18**

24 Ms. Lu claims that Mr. Prado “arranged for a meeting to discuss my demands
25 for ceasing-contact. We met at Rey Amargo, during which our conversation became
26 heated and I stated my intention to leave. Angelo physically attempted to block me from

1 *leaving (...) he followed me and demanded we continue the conversation at Noren.”*

2 These allegations are untrue and deeply misleading. On 6/18, 2022 Ms. Lu
3 reached out to Mr. Prado and asked him to pick her up from the airport [Exhibit 4], as
4 well as her friend San. They were flying in from New York (Ms. Lu had asked him to
5 book flights for her) and he was in Seattle. The week prior, she had requested that Mr.
6 Prado make her apartment available to San, while he was out of town visiting his
7 family. It's important to note that Ms. Lu's request to have Mr. Prado pick her up from
8 the airport is entirely inconsistent with her narrative that she does not want to see Mr.
9 Prado, that she fears Mr. Prado, or that she has been avoiding contact with Mr. Prado.
10 They have in fact seen each other, traveled, and texted countless times every month in
11 2022, up to the filing of this petition.

12 At some point, Mr. Prado and Ms. Lu decided to meet at Starbucks to discuss
13 their relationship, and a plan to improve her performance at work by enrolling into a
14 formal online training program. After attempting to talk at Starbucks, Mr. Prado and
15 Ms. Lu decided it was too loud and walked together to a nearby chocolate shop (Rey
16 Amargo). After arriving, Ms. Lu started elevating her voice which made Mr. Prado
17 uncomfortable, and told him that “she hated him”. Mr. Prado took care of the check
18 and they left for a casual restaurant next door at Ms. Lu's suggestion¹. She was, in fact,
19 not followed, as they both walked together to Noren (Sushi restaurant), which she
20 personally suggested.

21 Ms. Lu then claims that Mr. Prado verbally berated her and threatened her with
22 legal action, discipline at work and social humiliation and harassment against her
23 friends and family².

24
25
26 ¹ This is what Ms. Lu describes in her petition as “being followed.” She actually suggested that the two go next door.

² Ms. Lu claims “there were multiple witnesses” but has not provided a single witness to this account.

1 The truth is this simply did not happen. Text messages provided to the court
2 show a very different picture than what Ms. Lu alleges. As a general matter, the text
3 messages show that Mr. Prado has been nothing but supportive of Ms. Lu. And while
4 Mr. Prado does acknowledge having a difficult conversation with Ms. Lu on June 18th,
5 it primarily centered on Mr. Prado indicating he did not want to continue financially
6 supporting Ms. Lu, that she shouldn't be using a hardware device she had acquired to
7 pretend being logged into work computers³, and as a general matter she needed to work
8 on a plan to gain additional skills and perform better. While Ms. Lu is on Mr. Prado's
9 team, Mr. Prado is not her day-to-day supervisor at work, as Mr. Nitin Jami manages
10 Ms. Lu's work directly **[Exhibit 1]**. Unfortunately, Ms. Lu has received negative
11 performance feedback from her lead, and she has acknowledged to frequently struggle
12 with her day-to-day tasks **[Exhibit 2]**, despite Mr. Prado's assistance **[Exhibit 6]**.

13 Mr. Prado was having this conversation as a friend and out of concern that he
14 could not keep subsidizing Ms. Lu's life indefinitely. Certainly, that conversation may
15 have been something other than what Ms. Lu wanted to hear, but it was not abusive in
16 any way.

17 Further, Mr. Prado has never harassed Ms. Lu through her friends or family. He
18 has never contacted Ms. Lu's family and has never harassed Ms. Lu's friends. Ms. Lu's
19 meritless claim in this regard is in contrast with text messages that show that she would
20 often invite Mr. Prado out to meet her friends and socialize with them. **[Exhibit 5]**

21 Ms. Lu then says that she left the building again, and Angelo followed her out to
22 the street and "continued to threaten [her] by calling a mutual coworker to expose her".
23

24 ³ Ms. Lu actually bought a device that simulates computer mouse movements so that she could leave work
25 undetected. Since Mr. Prado had vouched for Ms. Lu at Microsoft, it was not only affecting her but potentially
26 affected him. Moreover, Mr. Prado was genuinely concerned that Ms. Lu would be terminated if this behavior
continued and was discovered. If Ms. Lu lost her job a) he was genuinely worried about her wellbeing if she was
terminated b) it would look bad for him for having recommended her and c) he was concerned that if she lost her
job, Ms. Lu's demands for financial help would only get worse.

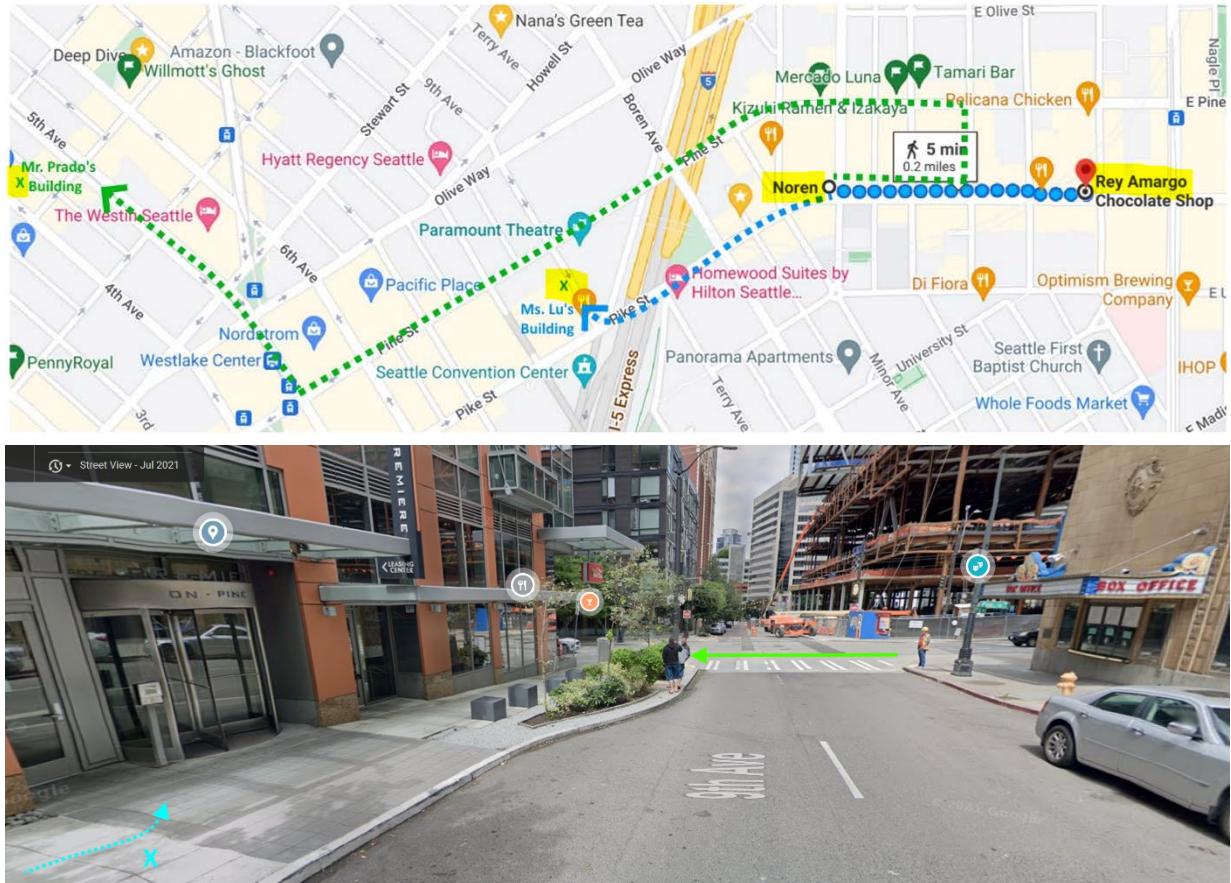
1 She further claims that Mr. Prado “physically intimidated her by cornering her against
2 buildings after she broke into a run.”

3 This is deeply inaccurate. Mr. Prado never physically blocked Ms. Lu from
4 leaving. At the restaurant, he did urge Ms. Lu to stay because she had promised to pay
5 for the bill this time, and the bill had not been settled yet. Ms. Lu eventually did settle
6 the check, asked to box all the food, but quipped that she had been in contact with an
7 attorney about potential legal action. While Mr. Prado acknowledges engaging in this
8 conversation, he did not threaten her with expensive legal action, harassment, or
9 anything else, and more importantly did not prevent her from leaving. Mr. Prado did
10 leave the restaurant with Ms. Lu, where the discussion continued. She started recording
11 the conversation on her phone and called her friend San. Because of Ms. Lu’s
12 confrontational behavior, Mr. Prado did not feel safe and briefly called a friend for
13 advice. Ms. Lu continued to yell at Mr. Prado saying things like “she did not have to be
14 nice to him” that she “could have him deported”, “life isn’t fair” and other expletives.
15 Mr. Prado did not engage in this screaming and kept his voice conversational on the
16 street, but at this point, he decided to leave as the conversation clearly was not
17 productive. Mr. Prado took East Pine Street towards his home in 4th Avenue. Jenny
18 went in the opposite direction via Pike Street.

19 Ms. Lu then claims that the friend she called for help then intervened and left
20 together to go to her apartment and acknowledges that Mr. Prado took a different route.
21 She then says that Mr. Prado “appeared at my apartment while we were outside and
22 “verbally accosted her and her friend and made several more threats before leaving.”

23 Mr. Prado did not follow Ms. Lu to her apartment building. He was walking
24 back to his own apartment. Although he took a different route, he ran into Ms. Lu and
25 her friend San on the way (several blocks later). This was close to 150ft but not “in
26 front of Ms. Lu’s apartment”, as he did not walk by Ms. Lu’s apartment building

1 entrance. Given the locations of Ms. Lu's and Mr. Prado's residences, it's
2 understandable how this could happen:



17 Ms. Lu was on 9th Avenue between Pike and Pine with her friend San. Mr.
18 Prado can't remember who initiated, but following eye contact they resumed their
19 conversation on the street at a healthy distance from each other. This last encounter
20 was also in public, and Ms. Lu appeared to be recording on her phone. Mr. Prado did
21 not make any threats. In fact, Mr. Prado attempted to deescalate the situation by
22 suggesting that there was a better way to end their relationship. Ms. Lu's friend
23 suggested that Ms. Lu come with her inside the apartment building, but Ms. Lu elected
24 to talk for approximately 10 minutes longer. Eventually San was able to convince Ms.
25 Lu to end the conversation and Mr. Prado continued walking home. They have not
26 communicated since.

1 Mr. Prado did not threaten to send any “compromising materials” to her ex
2 dating partners or anyone else for that matter. He has never texted her friends and has
3 shown nothing but support for Ms. Lu when she was struggling at work. **[See Exhibits**
4 **2 and 6].** Mr. Prado cared about Ms. Lu and his actions reflected that. While this
5 situation is very frustrating, Mr. Prado genuinely wants Ms. Lu to be happy regardless
6 of whether they are in each other’s lives or not.

7

8 **B. Other Claims**

9 Ms. Lu has made a series of other claims about Mr. Prado that are also untrue.
10 Most of these allegations are in direct contradiction to text messages provided to the
11 Court. Others are simply nonsensical. The remaining allegations are simply without
12 any proof. The allegations are listed below along with a summary of Mr. Prado’s
13 response.

14

15 1. *Ms. Lu’s claim: "I have been in a multi-year coercive relationship with*
16 *Angelo characterized by extreme psychological and emotional abuse,*
17 *financial control and reputational and social threats"*

18 There has been no coercion, abuse or attempts to damage Ms. Lu’s life or
19 reputation in any way. The truth is that Mr. Prado has been incredibly generous to Ms.
20 Lu with his time, emotional support, with opportunities and financial assistance.
21 Characterizing any of this as abusive or coercive is untrue. Mr. Prado has helped Ms.
22 Lu find a good job at Microsoft, has helped her in every way he can at her new role, has
23 provided her between \$3,000 to \$5,000 per month **[See Exhibit 7 and Exhibit 22]**, has
24 provided her with a car, purchased furniture, beauty treatments and the latest
25 technology for her, and has taken her on numerous trips and experiences around the
26 world.

1
2. Ms. Lu's claim: "Angelo has isolated and removed me from my friends and
3 family (he arranged for my employment under his direct management) and
4 relocated me from New York to Washington in February 2022), weakening
5 my support system"

6 Mr. Prado did not "remove Ms. Lu from her friends and family" in New York.

7 In fact, Ms. Lu moved from New York to California because her best friend and a
8 different dating partner lived in Venice and Santa Monica, California. She wanted to
9 leave New York because it "was too cold" During the winter, and later said she had
10 "100% intention of moving to Seattle" and tried to get her own friends to move to
11 Seattle as well [Exhibit 21]

12
13 Jenny Lu >
14 I can't really think about romantic
15 relationships much right now
16 while I'm still figuring out the
17 larger ways to ground and
18 stabilize my life
19
20 Like work, and where I live
21 I have 100% intention of moving
22 to Seattle

23 Hmm could you review my
24 friends resume and give me
25 feedback on how best to assist
26 his job search???

27 I'm still selfishly trying to get
28 them to come live with me for a
29 few months in Seattle before I
30 ditch them for somewhere else,
31 but they won't move unless it's
32 for a job

33 Jenny Lu >
34 Oh no, they know that I'll ditch
35 them eventually

36 They don't like Seattle yet, but I
37 think they will!!!

38 I still think Galen's best bet for
39 future flexibility is to have a
40 better job

41 Similar w my case

42 They just have less immediate
43 incentive or necessity to move
44 from the bay

21 While in California, at Ms. Lu's request Mr. Prado paid off and transferred his
22 car to her at a heavily discounted price (a 2020 Mazda 3). See [Exhibit 8]. Mr. Prado
23 also helped Ms. Lu financially with cash and any flight bookings she would need. It
24 was not his demand that she leave New York. And when Ms. Lu continued to struggle
25 financially, Mr. Prado helped with her resume and application to Microsoft. This was
26

1 generosity of a friend—not abuse. Ms. Lu seems to believe that if she needed anything
2 at all, any action to help her is inherently coercive. That is simply not the case.

3 Further illustrating that Ms. Lu was not coerced to move to Seattle, the Microsoft
4 job posting was actually an east coast position and it was available to be fully remote
5 (100% work from home) from New York, where she had previously lived and would
6 have had access to her parents' house.

7 It was Ms. Lu who wanted to come to Seattle to be closer to several of her West
8 Coast friends, networking benefits, higher pay opportunity and no income tax. As a
9 result, she accepted a full relocation package from Microsoft worth more than \$20,000
10 and a larger signing bonus. Not only has Mr. Prado not isolated Ms. Lu, he has paid for
11 more than 20 flights to New York for Ms. Lu to see her family—in many of these
12 occasions, Mr. Prado did not even travel with Ms. Lu.

13
14 3. *Ms. Lu's claim: "He took advantage of me when I was economically
15 vulnerable from being unemployed to offer me employment, and has
16 subsequently repeated threatened firing and reputational harm if I do not
17 comply with his demands"*

18 This is also deliberately false. As an initial matter, Ms. Lu was not unemployed
19 when she met Mr. Prado. She was employed full time as an Operations Program
20 Manager at a company called Exiger, working remotely. [Exhibit 10]

21
22 Dude I've never been to Ibiza 😊
23 You haven't ...
24 No!!
25 I know, I'm missing out 😊
26 You could take a day or two off
yeah?
Yea! Omg we actually get that
Friday off as a company
"Exiger day"

1 Hmm do you think I should put all my income from the rest of the year into my 401k???

2 Part of SAP

3 Lol

4 Hmm that's a great question

5 I doubt that they'd enroll you on time

6 But then I'll have no cash money

7 😭

8 Haha oh rip

9 I think fidelity has to catch up to it... it takes a couple weeks

10 Shoulda gone harder at exiger

9 While employed at Exiger, she repeatedly asked for Mr. Prado's help advancing
10 her professional life, and together they envisioned a role that would suit Ms. Lu's long-
11 term career interests. He helped her revamp her resume and prepare for the interview
12 process which ultimately led to a job offer [Exhibit 9]. To characterize any of this as
13 abuse is hard to understand.

14 Thank yuu

15 

16 I am grateful for the opportunity,
but I am extraordinary
underprepared

17 Rly. Thanks for prepping me

18 Lmao ok realistically if I were to
stop studying now and take the
test would I pass

19 

20 Failure is really not an option

21 Hypotheticalalvyy

22 4. Ms. Lu's claim: "He used the power and authority he has over me at work to
23 coercively force me into several cross-country and international trips, destabilizing my
24 living routine and basic living functions (eating, sleeping)"

25 Ms. Lu's allegation that Mr. Prado "forced her" to travel is frankly ridiculous,
26 especially when their text messages are taken into consideration. The reality is, that

1 most of Ms. Lu's and Mr. Prado's travel occurred prior to Ms. Lu joining Microsoft.
2 Ms. Lu was never forced to join Mr. Prado. Ms. Lu was excited about these trips.
3 Together they visited Mexico, Spain, Italy, Dubai etc.

4 Numerous excerpts of text messages from Ms. Lu demonstrate this:

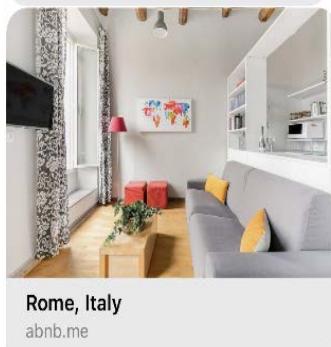
5
6 Specifically I want to quit life and
7 love to a Greek island
8 And herd goats and make
cheese

9
10 Ok April 8-10 I'll be in Vegas for
Maddies birthday. I'm thinking I
want to be in Boston March
18-20 but I haven't decided yet
The rest I'm theoretically free
Maybe Feb 25-27 we can go to
Vancouver or something?

11 Haha aww thanks for planning!!
12 I know nothinggg about Dubai
but I'll poke around to see if
there's anything spectacular that
I think would be cool for us to
check out 😊

13
14 Jenny Lu Chat 4 more +
15 Jenny Lu 1/5/2022 4:34 PM
Oh I'm in SF 21-23
16 Forreal. For my friends bday

17
18 Hmm I think we could maybe
cover 2-3 cities during the trip, if
we wanted to choose a cluster?
Like Rome for 1-2 days, then
Naples > Amalfi coast
Or Naples to salerno and then
maybe further south/west?
19 Lol sorry my sense of Italian
geography/logistics is mediocre



20
21 Let's stay in London til Sunday
morning! We can do like a cute
museum day on Saturday!! 😊
22 And go out at night and then
come back and watch dexter and
pass out 😊

23
24
25 It's a man made island than can
be seen from the ISS
26 Have literally never been to the
Middle East lol so it'll be really
interesting!!!!

Based on these text messages **[Exhibit 11]**, it is hard to characterize her claim that these trips were coerced as anything other than dishonest in her petition to the court.

5. Ms. Lu's claim: "He has held me against my will in several locations (his apartment, hotel rooms, public locations). Threats he has made include vivid description of the suffering I will endure once 'I have no one to support me' in my life, the hopelessness of my career prospects without his help, destitution without either a paid job or his financial support, and emotional battery over my worthiness"

This allegation is also false. Mr. Prado has been a supportive friend and he has made many efforts to raise Ms. Lu's self-esteem and improve her life. On numerous occasions, Ms. Lu has said things that reflect poor self-esteem and Mr. Prado has made efforts to help. He has never physically prevented her from moving against her will. Ms. Lu had the keys to Mr. Prado's apartment (Mr. Prado never had the keys to Ms. Lu's apartment.). She was free to come into Mr. Prado's residence anytime and take whatever she needed, which she did on numerous occasions.

Throughout their relationship, Mr. Prado always treated Ms. Lu with respect and generosity, indicating that he appreciated her and never once questioned her worthiness.

There are many text messages that demonstrate this as late as May of 2022

[Exhibit 12] and June of 2022 [Exhibit 13]

6. Ms. Lu's claim: "There has been coerced, nonconsensual sexual activity"

Again, this is false. While there have been sexual relations with Mr. Prado and Ms. Lu, those encounters have been entirely consensual. There is no evidence of a non-consensual encounter that has been presented and considering Ms. Lu's other claims in her petition that are easily rebutted—her characterization should be viewed with skepticism. Mr. Prado requests that the court review text messages in the exhibits, all the way through June 2022, and conclude that Mr. Prado had been coercing non-

1 consensual sexual activity with Ms. Lu. Mr. Prado also requests that the Court review
2 Exhibit 22 (Declaration of Lina Zhu). That declaration details that Ms. Lu frequently
3 indicated that she wanted financial support from Mr. Prado but never once referenced
4 abuse, coercion or sexual violence at any time⁴.

5

6 Ms. Lu was not pressured or coerced to engage in any sexual activity.

7

8 1. *Ms. Lu's claim: "In April 2022 (...) I indicated my intent to not interact with*
9 *him further. I took a leave of absence from work to avoid seeing him there"*

10 This is also untrue. The reality is that Ms. Lu continued to text and
11 communicate with Mr. Prado as late as May and June of 2022, so it's entirely
12 inconsistent that her motivation for her "leave of absence" was to avoid Mr. Prado. The
13 truth is that taking advantage of Microsoft's generous hybrid work policy, Ms. Lu
14 requested an accommodation to work from home/remotely at least 80% of the time on
15 December 8th, 2021, so she could improve her performance - this was approved. It's
16 also telling that four months into the job, she was attempting to take a leave of absence
17 from work. In April of 2022, Ms. Lu was in Las Vegas with her friends attending two
18 pool parties, and she texted Mr. Prado that the mental health professional she saw was
19 not willing to write a letter supportive of a leave of absence [Exhibit 14]:

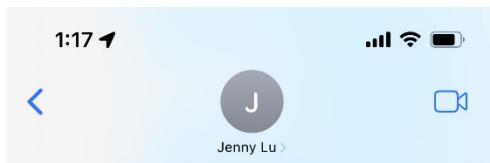
20

21

22

23

24 ⁴ Ms. Zhu can also provide additional details relating to consent that would be subject to RCW 7.105.200
25 subsections 9(a) and 9(b). Because there is ample evidence that Ms. Lu's claims are false, the Court can and
26 should rule in favor of Mr. Prado without this additional evidence. However, if the court has any hesitation in
ruling for Mr. Prado, counsel can and will file a motion and offer of proof in accordance with the statute and will
request to continue in order for the court to properly rule and review the additional evidence. Should this occur,
Mr. Prado would ask the court to revise the temporary no contact order so that he can return to work and be a part
of electronic communications with his team.



Thu, Apr 7, 1:55 PM

Found cake?

Haha I was gonna get her a milk bar cake but apparently the vegas location is weirdly really bad? So think we'll just go with a wholefoods cake instead lol

Shrink wouldn't write me a LOA note :(need to find a new shrink now

"Insurance fraud" "need to find someone local" etc etc

She also says she doubts I'll find anyone who'll be willing to sign off on it before a predetermined number of sessions together

So looks like my plan or at least timeline is kinda foiled :(



Fri, Apr 8, 6:08 PM

Sorry was out at the pool all day no reception!

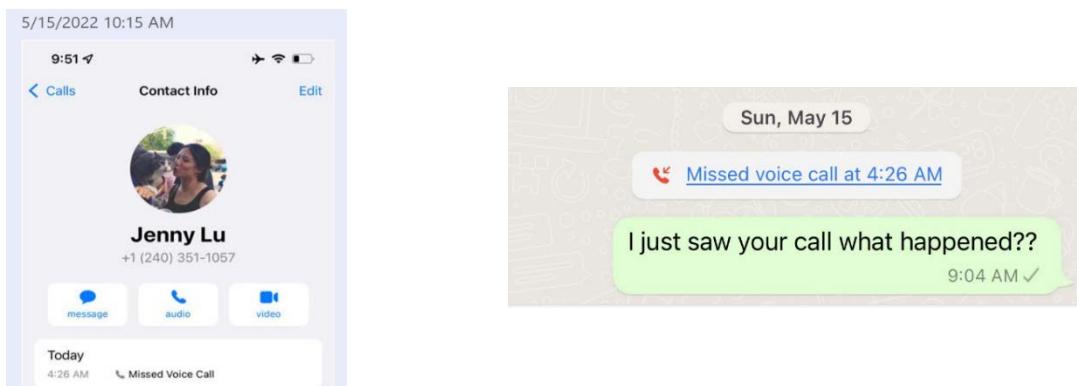
Did you reply to Alex??

Screenshots from April 8th, 2022 show Ms. Lu going to Las Vegas to several pool parties and asking Mr. Prado to book her an additional hotel night, around the time she was requesting a leave of absence, which calls into question her motivations as to seeking her leave. **[Exhibit 14]**. If anything, the evidence shows that Ms. Lu was trying to avoid work and difficult conversations with her Team Lead, not Mr. Prado.

2. *Ms. Lu's claim: "Angelo responded by messaging me repeatedly on numerous platforms" – "As well as messaging my friends (i.e. on LinkedIn – he found the contact information of multiple friends and a former dating partner and threatened to message them exposing me). While estranged, he used work resources to ask coworkers to message me to 'check in on me'"*

This is inaccurate. While flying back from a Dublin, Ireland work trip, Ms. Lu called Mr. Prado in the middle of the night on WhatsApp at 4:26 am Eastern Time on a Sunday. **[Exhibit 15]**. This was unusual, as Ms. Lu and Mr. Prado rarely call each

1 other unprompted. Calls were only utilized in emergencies. Given this and the unusual
2 time of the call, Mr. Prado was concerned that Ms. Lu needed help. He was concerned
3 she was ill, had been in an accident or that her safety was threatened. When Mr. Prado
4 could not reach her, he did ask a couple people (a coworker and a common friend of
5 theirs at the time, Maddie) to help make sure she was okay. This was simply a welfare
6 check, nothing more.



13
14 This was the first and only time Mr. Prado asked anyone to reach out to Ms. Lu
15 and it was entirely appropriate. Later that same week we resumed talking/texting as
16 usual [Exhibit 12].

17
18 3. Ms. Lu's claim: "He showed up to my apartment unannounced on 4/25 and
19 was asked to leave and added to the restricted list"

20 This is also false and very misleading. Mr. Prado did not go up to Ms. Lu's
21 apartment uninvited and if she did put him on a restricted list in April, that is a surprise
22 to Mr. Prado. Mr. Prado brought her some things she had requested earlier and left
23 them outside before she got home. It's also telling that Ms. Lu invited Mr. Prado to
24 dinner at her apartment in May and he picked her up several times to go to the gym in
25 May and June, as well as running outside, going to several jazz performances,
26 restaurants and additional trips together. [See Exhibit 12 and 13].

1
2 4. Ms. Lu's claim: "He traveled across the country and again showed up
3 uninvited an at event on my birthday in New York on 5/4 where he accosted
4 me and my friend in public until he was asked to leave.

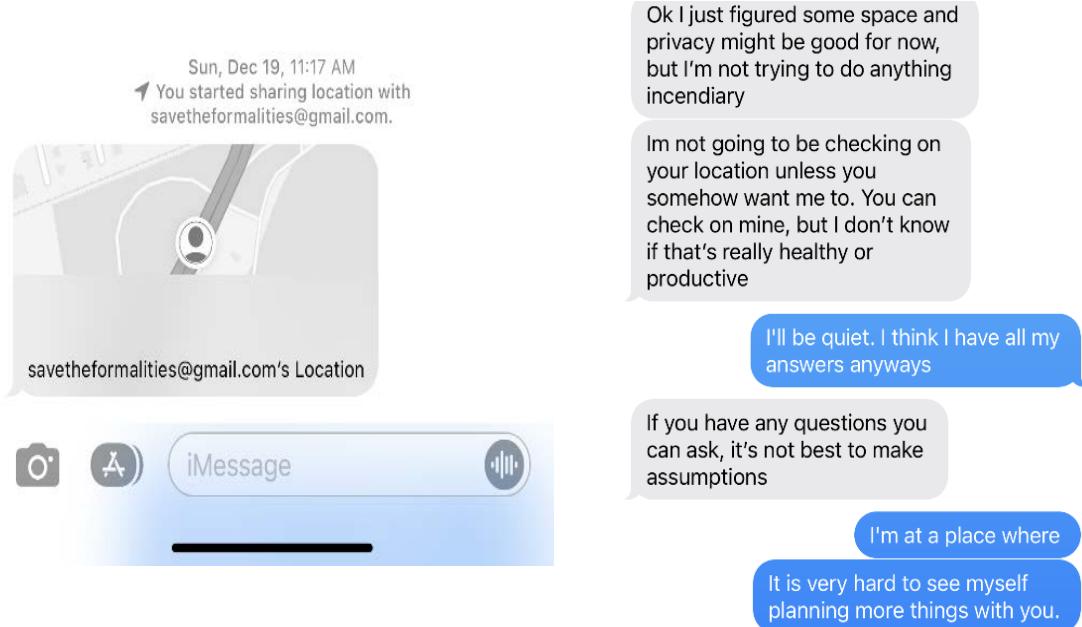
5 This is also false and deeply misleading. Ms. Lu and Mr. Prado traveled to New
6 York together as they did roughly every month and had previously agreed to meet for
7 her birthday. Ms. Lu cancelled at the last minute (after Mr. Prado was in New York).
8 Mr. Prado stopped by the restaurant briefly to bring Ms. Lu a birthday gift and then left.
9 He did not go inside the restaurant; he did not verbally accost Ms. Lu. Ms. Lu was
10 surprised, and they both agreed to continue their conversation later. Mr. Prado did not
11 stay for her birthday at Ms. Lu's request. **[Exhibit 16 and Exhibit 17].**

12
13 While Mr. Prado was understandably disappointed that he was "uninvited" to
14 Ms. Lu's birthday, there were absolutely no threats. This is evidenced by the fact that
15 the two of them resumed communication shortly after May 4th. **[Exhibit 12]**

16
17
18 5. Ms. Lu's claim: "He later revealed he had turned location sharing services
19 sharing on in my phone"

20 Mr. Prado did not unlawfully track Ms. Lu's phone. Mr. Prado didn't use any
21 spy software or anything of illicit nature. Both Ms. Lu and Mr. Prado utilized Apple's
22 location sharing services in the "find my friends" application. As referenced prior, Mr.
23 Prado and Ms. Lu were not an exclusive couple, and they shared their locations in order
24 to avoid messaging when the others were in social situations or on dates. This was
25 never abused or used maliciously. When Ms. Lu revoked her location, Mr. Prado

1 similarly stopped sharing his. Any time they would share location with each other, A
2 message would appear in their text as seen on **[Exhibit 20]**.



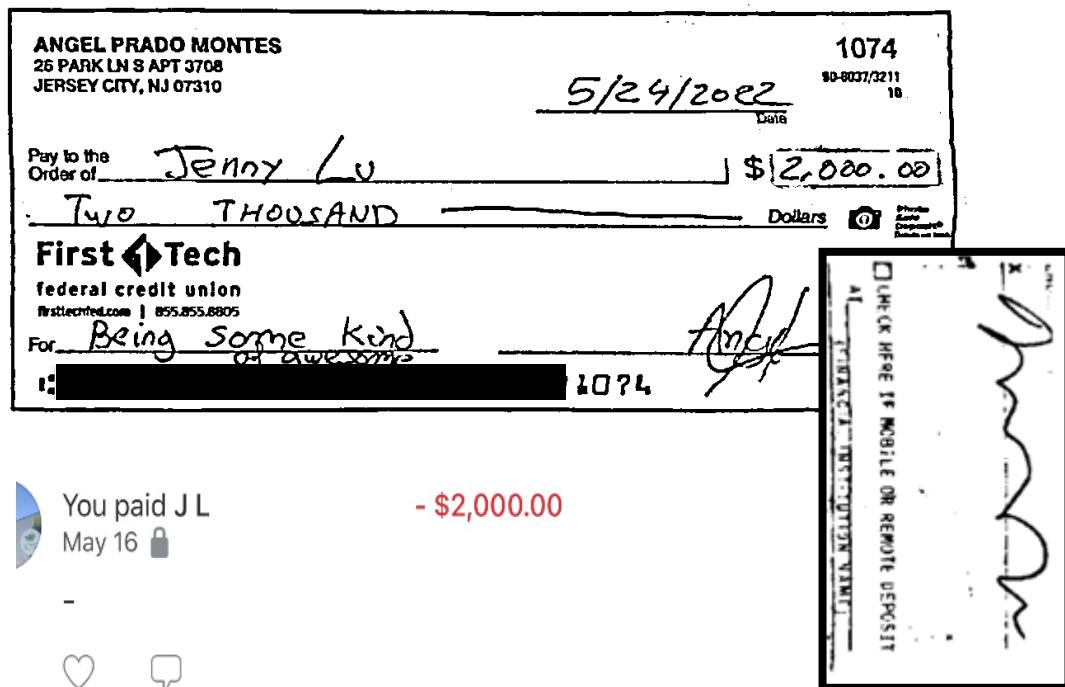
13 6. Ms. Lu's claim: "on 5/16 he showed up at my gym (Pro Club Bellevue) and
14 demanded to speak, threatening self-harm and reputational harm if I did not
15 comply. During these episodes he repeatedly threatens further stalking and
16 economic harm"

17 This is also incorrect. As an initial matter, Mr. Prado has been a member of the Pro
18 Club in Bellevue long before Ms. Lu, where he also had a personal trainer last year. He
19 was the one who introduced her to Pro Club. The two had gone to Pro Club together
20 countless times before and after May 16th. **[Exhibit 17, Exhibit 13, Exhibit 12]**.

21 To characterize this as "her gym", omitting that Mr. Prado is also a member of
22 that gym, bears on Ms. Lu's credibility and her continued willingness to mislead the
23 court. The truth is, on May 16th, Mr. Prado and Ms. Lu ran into each other at the Pro
24 Club in Bellevue, a Microsoft-sponsored fitness center. The two were having issues, so
25 they talked for approximately two hours at the Club's café to try to hash out their
26 differences – There were no threats of self-harm or threats of any kind.

1 There were also no threats of “economic harm.” Ms. Lu did indicate to Mr.
2 Prado that she needed more money. She asked for \$3,000 per month and an immediate
3 \$5,000 allowance for what she categorized as “urgent cashflow problems.” This was
4 very frustrating for Mr. Prado as he had been providing Ms. Lu with significant
5 financial support for years, and access to better opportunities. He thought this would
6 improve when she started working at Microsoft (approximately tripling her income) but
7 it didn’t.

8 Mr. Prado accepted Ms. Lu’s demands and gave her \$5,000, including a Venmo
9 \$2,000 transfer that day, \$1,000 cash, and a \$2,000 check that she deposited days later
10 as seen on [Exhibit 7].



7. Ms. Lu's claim: "I have been seeking treatment for depression since May 2021 due to psychological and emotional harm from the relationship. Since April 2022, I have been seeking treatment for PTSD, major depression, anxiety, insomnia and panic due to the effects of the stalking and verbal threats."

Again, Mr. Prado denies threatening Ms. Lu or causing her any psychological or emotional harm. While it's hard to know exactly what Ms. Lu is being treated for, what is known is that she mentioned at least one mental health professional that referenced "*insurance fraud*" when she attempted to get that person to write a letter to her employer supportive of a leave of absence. **[Exhibit 14]**, and actively looked for a new therapist that would write her that note:

Thu, Apr 14, 1:10 PM

Hi! Sorry I was in my doc appointment

I THINK he agreed to write me a LOA note?!?!!!!

Omg

Which doctor

New one you found?

Yea!!!

He didn't even ask for any follow up....

Idk this guy was kinda weird.
Seemed disorganized lol

It's within this context that the court should view this allegation. Like Ms. Lu was trying to mislead her employer while she sought a leave of absence, she is now misleading this court.

III. Conclusion

Ms. Lu's allegations simply are not credible. Her account is misleading and untrue. Mr. Prado and Ms. Lu have had a multi-year relationship in which Mr. Prado has been supportive, patient and extraordinarily generous. Withholding of indefinite economic support is not abuse and is not a basis for a no-contact order under any legal theory.

DATED this 15th day of July 2022.

Respectfully submitted,

s/Brent Hart
Attorney for PRADO